

# **EXHIBIT A**

## Dierkes, Michael

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**From:** Thomas Geoghegan <tgeoghegan@dsgchicago.com>  
**Sent:** Friday, March 4, 2022 5:00 PM  
**To:** Dierkes, Michael  
**Subject:** Re: [EXTERNAL] discovery

Mike

We want normal discovery, and that is now effectively impossible in this century without ESI. And it is too complicated in our view to limit normal discovery in ambiguous ways.

But I do want to assure you we agree to hold off depositions.

Tom.

On Thu, Mar 3, 2022 at 5:11 PM Dierkes, Michael <[Michael.Dierkes@ilag.gov](mailto:Michael.Dierkes@ilag.gov)> wrote:

Hi Tom: I'm conferring with my client and will get back to you shortly, but just to make sure I understand your position, is there any willingness on plaintiffs' part to consider a compromise beyond no depositions? For example, holding off on ESI and staging discovery based on priorities?

Thanks,

Mike

Michael T. Dierkes  
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**From:** Thomas Geoghegan <[tgeoghegan@dsgchicago.com](mailto:tgeoghegan@dsgchicago.com)>  
**Sent:** Wednesday, March 2, 2022 11:14 AM  
**To:** Dierkes, Michael <[Michael.Dierkes@ilag.gov](mailto:Michael.Dierkes@ilag.gov)>  
**Cc:** Jonathan Lowy <[jlowy@bradyunited.org](mailto:jlowy@bradyunited.org)>; Kelly Sampson <[ksampson@bradyunited.org](mailto:ksampson@bradyunited.org)>;  
[pbangle@bradyunited.org](mailto:pbangle@bradyunited.org) <[pbangle@bradyunited.org](mailto:pbangle@bradyunited.org)>  
**Subject:** [EXTERNAL] discovery

Mike

What is the defendants' response to starting normal discovery - and notifying the Court of our agreement?

As stated we will hold off depositions for the time being.

Tom

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